

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

Jessica Tischer, individually	)	
and as Personal Representative	)	
For the Spouse and Children of	)	
Jacob Tischer, Decedent,	)	Civil Action No. 3:19-cv-00166-jdp
	)	
Plaintiff,	)	
vs.	)	Magistrate Judge Stephen L. Crocker
	)	
Union Pacific Railroad Company,	)	
a Delaware corporation,	)	
	)	
Defendant.	)	
-----	)	
	)	
Union Pacific Railroad Company,	)	
a Delaware corporation,	)	
	)	
Defendant/Third-Party Plaintiff,	)	
vs.	)	
	)	
Professional Transportation, Inc.	)	
	)	
Third-Party Defendant.	)	

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**PLAINTIFF’S MOTION FOR PROTECTIVE ORDER**

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PLEASE TAKE NOTICE that Plaintiff Jessica Tischer (“Tischer”) by and through her undersigned counsel, brings the following Motion for Protective Order before the Honorable Stephen L. Crocker.

**MOTION**

Plaintiff moves the Court pursuant to Fed. R. Civ. P. 26.03 for a protective order specifying the terms, including the timing, of certain collateral-source written discovery sought by Third-Party Defendant PTI, or alternatively for a protective order establishing a process for designating Tischer’s collateral-source personal financial information as confidential and limiting the way that information can be disseminated and used.

This motion is based upon all the files, records, and proceedings in this case to date, including any further filings in support of Tischer's Motion, and the arguments of counsel.

HUNEGS, LeNEAVE & KVAS, P.A.

Dated: January 24, 2020

/s/ Paul Banker

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**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that a true and correct copy of the above foregoing instrument was properly forwarded to all counsel of record as listed below as follows:

- \_\_\_\_\_ United States Mail, postage prepaid and sealed;
- \_\_\_\_\_ United States Certified Mail, postage prepaid and return receipt requested;
- \_\_\_\_\_ Hand Delivery;
- \_\_\_\_\_ Federal Express/ Next Day Air;
- \_\_\_\_\_ Facsimile Transmission;
- X   Local Rule 5.1 Electronic Filing (U.S.D.C. WD WI); and/or
- \_\_\_\_\_ Email (.pdf)

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Dated: January 24, 2020

/s/ Paul Banker  
Paul Banker

***Jessica Tischer, individually and as Personal Representative For the Spouse and Children of Jacob Tischer, Decedent v. Union Pacific Railroad Company v. Professional Transportation, Inc.  
Court File No. 3:19-cv-00166-jdp***